

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JORDAN DESTIN, CHIDI IHUEZE,
CHARMAINE JOHNSON, BIANCA
JONES, GOLALEH KAMRAN, ARMINE
KARTALIAN, VIVIAN KITCHENS,
ROLAND MACK, CASSANDRA
MCKENZIE, ELRETHA PERKINS,
ULISSA POKHAN, HERBERT
RUSSELL, and REGINA SANDERS,

**CIVIL ACTION NO.
1:13-CV-1092-CAP**

Plaintiffs,

v.

WORLD FINANCIAL GROUP, INC.,

Defendant.

**PLAINTIFFS' RENEWED AND UNOPPOSED MOTION TO APPROVE
REVISED FLSA SETTLEMENT**

Pursuant to the Court's Order dated June 23, 2017, (Doc. 388),

Plaintiffs¹, through their counsel, submit this unopposed Motion to Approve
the Revised Fair Labor Standards Act ("FLSA") Stipulation and Settlement

¹ "Plaintiffs" include long-time named Plaintiff Jordan Destin and the following 12 individuals who previously filed consents to participate in this case as Opt-in Plaintiffs, had their claims dismissed without prejudice through the Court's Order decertifying the conditional collective action, and have since been added as plaintiffs to this action for the sole purpose of affecting the terms of the Settlement Agreement: Herbert Russell, Kamran Golaleh, Regina Sanders, Cassandra McKenzie, Charmaine Johnson, Elretha Perkins, Chidi Ihueze, Armine Kartalian, Vivian Kitchens, Roland Mack, Bianca Washington-Jones, and Ulissa Pokhan.

Agreement (“Revised Settlement Agreement”) that they entered into with Defendant World Financial Group, Inc. (“Defendant” or “WFG”). Plaintiffs and WFG have agreed upon the terms of the Revised Settlement Agreement to resolve Plaintiffs’ FLSA and all other possible wage and hour claims. Plaintiffs hereby attach as Exhibit A the Revised Settlement Agreement which removes any confidentiality provisions that were contained in the previously filed Settlement Agreement. (Doc. 387-1). Plaintiffs move this Court to approve the Revised Settlement Agreement, showing the Court as follows:

1. As described in the attached Memorandum of Law in Support of Plaintiffs’ Unopposed Motion and Declaration, WFG has agreed to pay Plaintiffs the following amounts of money which would be reflected as non-wage income for which Internal Revenue Service Form 1099s would be issued:

(Opt-in) Plaintiff	Settlement Amount
Jordan Destin	\$18,000
Herbert Russell	\$8,000
Cassandra McKenzie	\$8,000

Regina Sanders	\$8,000
Golaleh Kamran	\$8,000
Chidi Ihueze	\$3,500
Charmaine Johnson	\$3,500
Armina Kartalian	\$3,500
Vivian Kitchens	\$3,500
Roland Mack	\$3,500
Elretha Perkins	\$3,500
Ulissa Pokhan	\$3,500
Bianca Washington-Jones	\$3,500

2. In exchange for the above-described payments, each of the Plaintiffs agree to release all of their respective wage-related claims.

3. After separately negotiating attorneys' fees and expenses, WFG also agreed to pay Plaintiffs' counsel \$450,000 for their attorneys' fees, costs, and expenses incurred in this litigation. If the Court approves this amount, the majority of the \$450,000 (or 64%) will cover Plaintiffs' counsels' actual

expenses incurred in the case, leaving 36% (or \$162,031.24) to cover attorneys' fees.²

4. As described in the Memorandum of Law and Declaration included herein, this Court should approve the Revised Settlement Agreement because it is the result of arms' length negotiations, and it is a fair and reasonable resolution of a bona fide dispute involving claims for unpaid minimum wage and/or overtime wages under the FLSA.

5. Accordingly, Plaintiffs respectfully request that the Court grant this motion for approval of the Revised Settlement Agreement and enter an Order: (1) adjudging the terms of the Revised Settlement Agreement to be fair, reasonable and adequate, and in the best interests of the Plaintiffs, and direct consummation of its terms and provisions, including the settlement amounts to each of the Plaintiffs; (2) approving the requested attorneys' fees, costs and expenses to Plaintiffs' Counsel; and (3) dismissing all claims released in the Revised Settlement Agreement from the litigation on the merits with prejudice; and (4) permanently enjoining all Plaintiffs (including Releasing Persons)

² In accordance with Local Rule 54.2, this Motion sets forth a fair estimate of the total amount of fees and expenses, and specifies only that reduced amount which is sought in accordance with the Revised Settlement Agreement and which is unopposed by Defendants. Should the Court desire Plaintiffs to file more detailed information concerning that limited amount sought, or the fees and expenses actually incurred, Plaintiffs will do so promptly upon direction of the Court.

from prosecuting against Defendant and the Released Persons any of the Released Claims as defined in the Revised Settlement Agreement.

Respectfully submitted this 29th day of June, 2017.

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I hereby certify that on June 29, 2017, I electronically filed the foregoing
PLAINTIFFS' RENEWED AND UNOPPOSED MOTION TO APPROVE
REVISED FLSA SETTLEMENT with the Clerk of Court using the CM/ECF
system which will automatically send email notification of such filing to the
following attorneys of record:

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